

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, *et al.*,

Defendants.

Civ. No. 1:16-cv-00563 (TSE/TCB)

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS**

Pursuant to Fed. R. Civ. P. 6(b), the parties jointly move this Court to extend the deadline to file objections to the parties' exhibits from December 14, 2020 to December 23, 2020—a nine day extension. In support of this request, the parties respectfully represent as follows:

1. Pursuant to the Court's September 25, 2020 Order, the deadline for the parties pretrial submissions was rescheduled to December 4, 2020. (Dkt. 297.) On December 4, 2020, the parties filed their pretrial submissions pursuant to that Order. (Dkts. 312, 314.)

2. Pursuant to the Court's 2016 Initial Scheduling Order, the parties must file objections to the opposing parties' exhibits identified in the parties' pretrial disclosures "within 10 days" following the final pretrial conference, the date on which the parties were required to exchange exhibit lists and exchange the exhibits themselves. (Dkt. 35.)

3. Because the parties filed and exchanged their pretrial submissions on December 4, 2020, the Court's 2016 Initial Scheduling Order (Dkt. 35) requires the parties to file objections to the opposing parties' exhibits on or before December 14, 2020—ten days following the parties' exchange of exhibits.

4. In late March 2020, the global COVID-19 pandemic abruptly reduced this Court's in-person proceedings to "critical or emergency proceedings" only. On May 26, 2020, the Court resumed certain in-person proceedings, but determined that "[n]o civil jury trials shall be conducted until further notice[.]" *See* General Order No. 2020-16 at ¶ 6 (emphasis removed). On September 24, the Court entered General Order No. 2020-21, which provided for the resumption of criminal, but not civil, jury trials, and noted that the Court was still facing a significant burden in scheduling criminal trials. Accordingly, on September 25, this Court held that it was not yet appropriate to set a trial date in the above-captioned action. (Dkt. 297.)

5. Thereafter, because the COVID-19 pandemic made it unlikely for a jury trial to take place in this matter before Spring 2021 at the earliest, the parties petitioned the Court to extend the deadline to file Motions in Limine to January 11, 2021 and to set a briefing schedule following that date. (Dkt. 306.) The Court granted the parties' motion and entered an Order extending the deadline for Motions in Limine to January 11, 2021, setting a subsequent briefing schedule, and setting a hearing on Motions in Limine for March 3, 2021. (Dkts. 308, 310.)

6. Since then, the COVID-19 pandemic has worsened, with conditions worsening in this area and in the United States. As a result, this Court temporarily suspended all criminal jury trials with criminal jury trials to resume on January 19, 2021 absent further Order from this Court. *See* General Order No. 2020-22.

7. As a result, because a jury trial is unlikely to take place in this matter before late Spring 2021 at the earliest, the parties jointly and respectfully request an extension of the deadline for the parties to file objections to the opposing parties' exhibit lists from December 14, 2020 to December 23, 2020. This proposed nine-day extension will not impact any other deadlines in this matter.

8. A proposed order is attached for the Court's convenience. The parties waive a hearing on this Joint Motion.

Date: December 9, 2020

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP,
WAPLES PROJECT LIMITED PARTNERSHIP
AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Grayson P. Hanes (VSB #06614)
Michael S. Dingman (VSB #30031)
Justin deBettencourt (VSB #83806)
REED SMITH LLP
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com
Counsel for Defendants

Respectfully submitted,

/s/

LEGAL AID JUSTICE CENTER
Simon Sandoval-Moshenberg (VSB #77110)
Nady Peralta (VSB #91630)
6066 Leesburg Pike
Suite 520
Falls Church, VA 22041
(703) 778-3450 (Telephone)
(703) 778-3454 (Facsimile)
simon@justice4all.org
nady@justice4all.org

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

Kaiyeu Kevin Chu (VSB #85746)

Matthew Traupman (*pro hac vice*)

Gianna Puccinelli (*pro hac vice*)

1300 I Street N.W.

Suite 900

Washington, D.C. 20005

(202) 538-8000 (Telephone)

(202) 538-8100 (Facsimile)

kevinchu@quinnemanuel.com

matthewtraupman@quinnemanuel.com

giannapuccinelli@quinnemanuel.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2020, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

Grayson P. Hanes (VSB #06614)
Michael S. Dingman (VSB #30031)
Justin deBettencourt (VSB #83806)
REED SMITH LLP
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com
Counsel for Defendants